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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10
11 JORGE ALEJANDRO ROJAS,
12 Plaintiff,
13 v.
14
15 UNPLUGGED MEDIA, LLC, et al,
16 Defendants.

17 Case No. 2:23-cv-02667-AH-KS

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19 I, Jorge Alejandro Rojas, an adult of sound mind, declare as follows:
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21 1. I am the Plaintiff in this case, and make the following statements based on my
22 personal knowledge and records. If called to testify concerning any of these
23 statements, I will be able to do so.
24 2. I make the statements in this declaration in support of Plaintiff's Request for
25 Electronic Appearance via Zoom.
26 3. Previously, with respect to another request for electronic appearance in this case, I
27 e-mailed Defendant Alexander Bykhovsky concerning whether he would consent or
28 not consent to my request for electronic appearance on March 22, 2024, and he stated
in response on the same day "I'm not in the country, I don't consent to the Court's

**DECLARATION OF JORGE
ALEJANDRO ROJAS IN SUPPORT
OF REQUEST FOR ELECTRONIC
APPEARANCE VIA ZOOM**

jurisdiction over me.” I emailed him thereafter to ask for a time to confer prior to making the request in the earlier motion and he never responded.

4. Prior to making the request for default judgment in this case, I also sought conferral from each defendant as to a request to appear electronically, and I did not receive any response. I sent a further e-mail to Bykhovsky on April 14, 2025 seeking conferral for the request to appear electronically to the continued hearing scheduled for May 7, 2025, and did not receive a response. I also sent a conferral letter to each defendants last known address on April 16, 2025, and did not receive a response.
5. I am employed as a Systems Engineer, for a government contractor, and reside and work in a suburb of Chicago, Illinois.
6. My work schedule primarily consists of Monday through Friday, nine hours of work per day.
7. My current schedule for the week of the hearing would necessitate that I miss at least one, and possibly two days of work to attend the hearing in person, as I would travel from Chicago, Illinois. If I were to attend the hearing virtually the period which I miss would be shorter as I would not need to travel as well as be more economical because I would not need to purchase air fare. I would also need to arrange for someone to take over any customer meetings or commitments that I have for my position. Being able to attend the hearing virtually would allow for reduced interruption to my work schedule due to the associated travel and mitigate compression of my schedule.
8. When communicating with Defendant Bykhovsky concerning the entry of default against his company, Unplugged Media, LLC, he stated in response “I am in Panama. It is logistically impossible for me to address this until/unless I move back to the United States.”
9. I believe that attending the hearing virtually via Zoom would allow me the ability to answer any questions or concerns the Court has at oral argument concerning the pending motion for default judgment. I am unaware of any defendant intending to

1 attend based on their failure to appear, defend, or respond to the motion. No
2 defendant appeared at the scheduled hearing on March 12, 2025.
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4 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
5 and correct. Executed on April 28, 2025, in Bolingbrook, IL.
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8 Jorge Alejandro Rojas
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